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Attorney for Defendant
Jason Toland

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JASON TOLAND

Defendant.

Case No. 2:24-CR-0099-DAD

STIPULATION TO CONTINUE SENTENCING
HEARINGS; FINDINGS AND ORDER

DATE: November 5, 2024

TIME: 9:30 a.m.

COURT: Hon. Dale A. Drozd

STIPULATION

1. By previous order, this matter was set for sentencing hearing on November 5, 2024.
2. By this stipulation, the defendant now moves to continue his sentencing hearing until November 19, 2024.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) On May 1, 2024, the government filed an Information against defendant. ECF No. 1. On May 13, 2024, the defendant waived Indictment and entered a guilty plea to a single count of Violation of 18 U.S.C. § 287 – False Claims Against the United States.
 - b) Due to delays in scheduling defendant's probation interview (attributable to both the probation officer's, defense counsel's, and defendant's respective schedules), defendant's

1 probation interview did not occur until August 16, 2024. Pursuant to Federal Rule of Criminal
2 Procedure 32, the probation officer and counsel, respectively, required time to draft and respond
3 to the presentence report, and to gather documents for use in drafting the presentence report.
4 This formed the basis for the continuance in sentencing to November 5, 2024.

5 c) During preparation for and participation in the probation interview, counsel for
6 the defense determined that additional mitigation was required in preparation for sentencing.
7 Those efforts required scheduling with a consultant and the preparation of a report. While
8 progress have been made, additional time is required to finalize the sentencing mitigation.

9 d) The government does not object to the continuance.

10 e) Based on the above-stated findings, good cause exists to continue defendant's
11 sentencing hearing in this matter from November 5, 2024, to November 19, 2024.

12 f) The parties request the following modified disclosure schedule:

13 Draft PSR: Completed

14 Informal Objections: October 22, 2024

15 Final PSR: October 29, 2024

16 Corrections: November 5, 2024

17 Replies/Briefs: November 12, 2024

18 IT IS SO STIPULATED.

19
20 Dated: October 15, 2024

PHILLIP A. TALBERT
UNITED STATES ATTORNEY

21
22 /s/ Denise Yasinow
23 Denise Yasinow
24 Assistant United States Attorney

25 Dated: October 15, 2024

/s/ Candice L. Fields

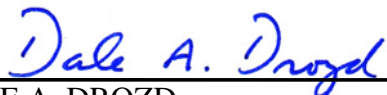
26 Candice L. Fields
27 Counsel for Defendant
28 Jason Toland

FINDINGS AND ORDER

Good cause appearing, it is ORDERED that the sentencing hearing of defendant Toland shall be continued to November 19, 2024 at 9:30 a.m.

IT IS SO ORDERED.

Dated: October 15, 2024



DALE A. DROZD
UNITED STATES DISTRICT JUDGE